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VIA ECF FILING

November 15, 2021

Hon. Vincent F. Papalia, U.S.B.J.
U.S. Bankruptcy Court, District of New Jersey
50 Walnut Street, Courtroom 3B
Newark, NJ 07102

RE: In re Evaristo Burdiez, Debtor
Chapter 13 | Case No. 20-23664/VFP

Dear Judge Papalia:

I just received Mr. Bronster's untimely filed opposition to the Debtor's cross-motion to expunge North Jersey Public Adjusters, Inc.'s proof of claim and cross-motion to compel discovery and award attorneys' fees.

At the last status conference hearing on October 21, 2021, your honor asked me to file a scheduling letter with specified deadlines. The scheduling letter was filed on October 26, 2021 (Docket Entry No. 144) and both Mr. Bronster and Ms. Cadre received notice of the letter as they are ECF participants. The scheduling letter was clear that any surreplies were due by November 12, 2021. Earlier today, your honor's law clerk, Margaret Hall, sent an email confirming the matters to be discussed on November 18, 2021. Given that neither Ms. Cadre nor Mr. Bronster filed a timely pleading by November 12, 2021, no untimely filing should be considered. I am certain that had I filed my cross-motions after the deadline specified by your honor's scheduling instructions, my adversaries would have vociferously opposed them as untimely.

I will not be responding to Mr. Bronster's attacks on my character and I will not entertain his outlandish theories about the case or his attempt to minimize his client's blatant violation of discovery rules and the issued subpoena.

Sincerely,

/s/ Roger Chavez
Roger Chavez
Attorney for Evaristo Burdiez